

## *Written summary of oral case*

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# **D4 POST-HEARING SUBMISSION INCLUDING SUMMARY OF UKWIN'S ISH4 ORAL SUBMISSIONS**

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**Proposed Development:**  
Medworth EfW CHP

**Proposed Location:**  
Land on the Algores Way Industrial Estate to the west of Algores Way in Wisbech, Fenland, Cambridge

**Applicant:**  
Medworth CHP Limited

**Planning Inspectorate Ref:**  
EN010110

**Registration Identification Ref:**  
20032985

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**MAY 2023**

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United Kingdom  
Without Incineration  
Network

## **INTRODUCTION**

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1. On the 17<sup>th</sup> of May 2023 UKWIN representatives Shlomo Downen and Josh Downen took part in Issue Specific Hearing 4 (ISH4).
2. UKWIN's ISH4 contribution related to Agenda Items 5 ('Climate Change including Carbon Mitigation and Carbon Capture').
3. At ISH4 UKWIN was asked to provide written versions of our oral evidence, and we do so below.

## **ISH4 AGENDA ITEM 5 (CLIMATE CHANGE INCLUDING CARBON MITIGATION AND CARBON CAPTURE)**

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4. UKWIN's oral evidence to ISH4 raised a series of matters as part of discussions about Agenda Item 5 that pertain to the Applicant's assessment of greenhouse gas (GHG) emissions, and these are summarised below.

### **Environment Agency permitting requirements**

5. UKWIN raised an issue in response to comments made on behalf of the Applicant that seemed to imply that the Environment Agency (EA) would require carbon capture and storage as part of the permitting regime.
6. UKWIN's point was that it would not be safe for the Examining Authority to assume that the EA would require either the demonstration of Decarbonisation Readiness or the delivery of carbon capture and storage as part of the permitting regime.
7. In response to UKWIN, the Applicant confirmed that there are currently no regulatory requirements for carbon capture and storage within the context of the EA's permitting regime.

### **The Applicant's spreadsheets**

8. UKWIN repeated the longstanding request that the Applicant provide us and the Examination with an unlocked copy of their carbon calculation spreadsheets – complete with formulas – that would enable a user to carry out sensitivity analysis and to confirm that the various calculations are both mathematically correct and methodologically sound.
9. UKWIN explained how we are familiar from other planning inquiries with the provision of such spreadsheets as evidence, for example as part of the inquiry that considered an application for an EfW facility at Rye House in Hertfordshire.
10. In response, the Applicant agreed to an action to provide a fully functioning, unlocked version of their GHG spreadsheet by Deadline 4.

## Waste composition

11. UKWIN referred to the Good Practice Guidance [REP1-096] and to how this establishes the importance of considering changes in waste composition within the context of assessing GHG emissions associated with waste incineration.
12. UKWIN pointed to the Applicant's Table 14C.1 of APP-088 which is on electronic page 42, noting how the Applicant's carbon analysis assessed the impact of biogenic carbon increasing from their core case by around 17 percentage points.
13. UKWIN took the opportunity afforded by ISH4 to ask the Applicant if they were willing to assess the impact of the biogenic carbon fraction reducing from their core case by around 17 percentage points to around 40% to show the equivalent impact in the other direction.
14. The Applicant responded to confirm that although they were not proposing to carry out any further sensitivity analysis with respect to waste composition, UKWIN was free to use the 'functional' spreadsheet, with the formulae included, that will be supplied to the Examination to undertake whatever analysis we might wish to carry out.

## Biogenic carbon sequestration in landfill

15. UKWIN has repeatedly raised our concerns about the Applicant's handling of the issue of biogenic carbon sequestration in landfill, including in our REP2-066 submission and at paragraphs 61-66 of REP3-050, where we explain how "The Applicant's calculations, despite their claim, did not made a deduction in relation to the non-fossil carbon which is sequestered in the landfill".
16. Such concerns are mirrored in Stephen Barclay's evidence, notably in REP2-064 Appendix 5, as summarised in Table 2 (on electronic page 122 of REP2-064).
17. The Applicant's failure to properly account for biogenic carbon sequestration in landfill is decisive in the comparative analysis of the relative carbon performance of the Medworth proposal relative to landfill.
18. When the Applicant's calculations are adjusted to properly account for the sequestration of biogenic carbon in landfill then the GHG impact of landfill is reduced by 171,846 tonnes of CO<sub>2</sub> per annum, which shows that the incinerator proposed for Medworth would be significantly worse than landfill with respect to GHG performance.
19. The method used for calculating the 171,846 tonnes per annum figure is straightforward and is set out on electronic page 121 of REP2-064.

20. The process involves multiplying the quantity of biogenic carbon that the Applicant assumes would be sequestered in landfill, which is 46,867 tonnes of biogenic carbon as set out in Table 14.24 of the Applicant's Climate assessment [APP-041], and then multiplying this figure by 44/12 to show how much biogenic CO<sub>2</sub> would be stored in landfill but released through incineration.
21. UKWIN took the opportunity afforded by ISH4 to ask the Applicant to confirm that they do not dispute that if one follows the methodology set out in REP2-064, and kept all other assumptions as per the Applicant's climate assessment [APP-041], this will result in reducing the GHG benefit of the facility by 171,846 tonnes of CO<sub>2</sub> per annum, which would be sufficient to tip the balance of the Medworth proposal to 'adverse', which the Applicant clarified – based on their ISH3 comments about how all climate impacts are considered 'Significant' – would be considered to constitute an 'adverse Significant effect'.
22. Despite having provided a response to REP2-064 at Deadline 3 (REP3-040), the Applicant stated at ISH3 that they were not sufficiently familiar with either the numbers or the methodology used in REP2-064 to be in a position to comment on them at ISH3.
23. The Applicant asked UKWIN to provide our question about biogenic carbon sequestration in landfill to them in writing as part of our D4 submission, and an agreed action undertaken by the Applicant was that they would respond.